

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

**IN RE: CATTLE AND BEEF
ANTITRUST LITIGATION**

This document relates to:

All Cases

Case No. 0:22-md-03031 (JRT/JFD)

**PLAINTIFFS' MOTION TO
PERMIT CERTAIN
DEPOSITIONS AFTER
APRIL 4, 2025**

The undersigned Plaintiffs hereby move this Court for an Order permitting certain depositions after April 4, 2025. Specifically, Direct Purchaser Plaintiffs, Commercial Indirect Purchaser Plaintiffs, Consumer Indirect Purchaser Plaintiffs, and Direct-Action Plaintiffs (collectively, the “Downstream Plaintiffs”) ask that the Court permit the deposition of the United States Department of Agriculture, Economic Research Service’s Dr. James MacDonald after April 4, 2025,¹ and all Plaintiffs ask that the Court permit Plaintiffs to take the depositions of Defendants’ Rule 30(b)(6) designees after April 4, 2025.² This motion is based on the memorandum, declaration, and materials submitted with this motion and the arguments of counsel at the hearing on the motion.

¹ The Cattle Plaintiffs and Feeder Plaintiffs do not oppose Downstream Plaintiffs’ request, but they do not consent to the use in their cases of any depositions of USDA witnesses taken after April 4, 2025.

² As explained in the accompanying memorandum, while there is no dispute between the parties about the holding of these depositions after April 4, 2025, Plaintiffs nevertheless request that the Court permit them to proceed after April 4, 2025 in the absence of a stipulation and proposed order.

Dated: April 3, 2025

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